

HARRIS
ST. LAURENT

October 23, 2020

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*So ordered
10.26.20
[Signature]*

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

My firm represents defendant Marc Lawrence in this matter.

I write to respectfully request that the Court modify Mr. Lawrence's conditions of release so as to require two financially responsible persons as co-signers on his personal recognizance bond instead of the current three. The government, through AUSA Ravi, consents to this request.

On June 26, 2019, this Court set certain conditions of release for Mr. Lawrence, including that he obtain the signatures of three financially responsible persons as co-signers on his personal recognizance bond. (Docket No. 8). While certain other conditions of Mr. Lawrence's release were modified, (Docket No. 31), the requirement that Mr. Lawrence obtain three financially responsible person as co-signers was not and Mr. Lawrence did obtain three such signatories. (Docket No. 33).

Approximately one year after the Court imposed these conditions, one of those signatories informed the government and undersigned counsel that she wished to be relieved of her obligations under the personal recognizance bond. To that end, on June 3, 2020, the undersigned moved this Court, with the consent of the government (AUSAs Ravi and Kamal) to relieve that co-signer of her obligations under the bond and to allow Mr. Lawrence to remain at liberty while he attempted to obtain another financially responsible person to co-sign the bond. (Docket No. 63). On June 5, 2020, this Court granted that request. (Docket No. 64).

Since that time, Mr. Lawrence has been diligently attempting to obtain another co-signer for the bond and undersigned counsel has been regularly updating the Court about his attempts. (Docket Nos 67, 69, 71, 73, 75, 77, 79, 82, 85). Unfortunately, despite his best efforts, Mr. Lawrence has not been able to obtain another financially responsible person to serve as a co-signer on his personal recognizance bond.

Mr. Lawrence respectfully requests that the conditions of release be modified so that he can remain at liberty with two financially responsible persons as co-signers instead of three.

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Mr. Lawrence has complied with all of the conditions of his release; has made all necessary Court appearances, including most recently at the change-of-plea hearing held on Monday October 19, 2020; and has had no contact with law enforcement. In addition, Mr. Lawrence is currently employed as a Practice Manager and Administrator, at Miss Mary, a psychological and behavioral health practice providing services to children in the greater Orlando area (<http://missmary.info/our-team.html>).

In light of these circumstances, we would respectfully request that the Court modify Mr. Lawrence's conditions of release to allow him to remain at liberty on the current personal recognizance bond, which is signed by two financially responsible persons, Dr. Hal Lawrence and Deborah Long. The government, through AUSA Ravi, consents to this request.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)